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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

PAMELA RUBIN-KNUDSEN, an individual; and MARNINE CASILLAS, and individual on behalf of themselves, and all other persons similarly situated,

Plaintiffs,

vs.

ARTHUR J. GALLAGHER & CO., a Delaware corporation, ARTHUR J. GALLAGHER SERVICE COMPANY, LLC, a limited liability company,

Defendants.

Case No.: 2:18-cv-06227-JGB-SPx

**PLAINTIFFS' NOTICE OF MOTION
AND UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT**

[Memorandum in support, Declarations of Jason M. Frank, Pamela Rubin-Knudsen, Marnine Casillas, David M. Breshears, CPA/CFF and Christopher Longley, and [Proposed] Order filed concurrently herewith]

Date: December 7, 2020
Time: 1:30 p.m.
Courtroom: 1
Judge: Hon. Jesus G. Bernal

TO THE COURT AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE that on December 7, 2020 at 1:30 p.m. in Courtroom 1 of the United States District Court for the Central District of California, Eastern Division, located at 3470 Twelfth Street, Riverside, California 92501-3801, Plaintiff Pamela Rubin-Knudsen and Marnine Casillas (“Plaintiffs”) will and herby do move for an order:

1. Granting preliminary approval of the Stipulation of Class and Representative Action Settlement between Plaintiffs and Defendants (the “Settlement”), a copy of which is attached as Exhibit A to the Memorandum in Support of Plaintiffs’ Motion for Preliminary Approval filed concurrently.

2. Appointing and approving Atticus Administration, LLC as the Settlement Administrator.

3. Approving the form and manner of notice to the Settlement Class as set forth in the Stipulation of Class and Representative Action Settlement.

4. Approving Jason M. Frank and Scott H. sims of Frank Sims & Stolper, LLP as Class Counsel for the Settlement Class.

5. Setting a Final Approval Hearing 28 days after the deadline for filing Motion for Final Approval, at 9:00 a.m. in Court 1 of the United States District Court, Central District of California, Eastern Division located at 3470 Twelfth Street, Riverside, California 92501-3801, or as soon thereafter as the Court’s schedule permits.

This Motion is and will be based on the grounds the requirements of Federal Rule of Civil Procedure 23 are met and on grounds the Settlement is fair, adequate and reasonable, and that the notice is the best notice practicable under the circumstances.

This Motion is based on this Notice of Motion and Unopposed Motion; the supporting Memorandum of Points and Authorities; the Declaration of Jason M. Frank; the Declaration of David M. Breshears, CPA/CFF; the Declaration of Pamela Rubin-Knudsen; the Declaration of Marnine Casillas; the Declaration of Christopher Longley; the [Proposed] Preliminary Approval Order; the pleadings on file herein, and such other

1 and further material to be offered at the hearing.
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3 Dated: November 9, 2020

FRANK SIMS & STOLPER LLP

4 By: /s/ Jason M. Frank
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